

UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

PENNSYLVANIA

UNITED STATES OF AMERICA

EXHIBIT LIST

V.

SUSAN GILBERT et. al.

Case Number:2:21-cr-79

PRESIDING JUDGE Hon. Robert J. Colville					PLAINTIFF'S ATTORNEY K. Gal-Or, A. McKendry, J. Brown, N. Stockey, S. Kaufman	DEFENDANT'S ATTORNEY J. Meltz, J. Ogrosky, J. Gatta, T. Smith, P. Pelletier, B. Moskow-Schnoll, M. Kussmaul, A. Carver, C. Recker, C. Callahan
TRIAL DATE (S) 11/14/23 - 12/15/23					COURT REPORTER B. Loch	COURTROOM DEPUTY C.Orendi
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
4257		11/20/2023	X		Federal Regulation Regarding Nursing Services	
4711		11/20/2023	X	X	Critical Element Pathway for Nursing	
4250		11/20/2023	X		Nursing Staffing Regulations	
3087		11/20/2023	X	X	Provider Pointers on Calculating Nursing Hours rev 2016	
880		11/20/2023	X	X	Provisional License 1	
881		11/20/2023	X	X	Provisional Licesnse 2	
28		11/20/2023	X	X	Statement of Deficiency for Brighton 6/18/2018	
929a		11/20/2023	X	X	Portion of Survey Packet	
929b		11/20/2023	X	X	Record Regarding "Maintaining Mursing Hours at Mandated Levels	
929c		11/20/2023	X	X	Facility Policy Statement	
928		11/20/2023	X	X	Nursing Care Hours Grid	
935a		11/20/2023	X	X	Complaint Survey	
938a		11/20/2023	X	X	Complaint Survey	
950a		11/20/2023	X	X	Complaint Survey	
940		11/20/2023	X	X	Nursing Care Hours Grid	
24		11/20/2023	X	X	Statement of Deficiency	
959a		11/20/2023	X	X	Cover Sheet for Survey	
956		11/20/2023	X	X	Nursing Care Hours Grid	
961		11/20/2023	X	X	Nursing Care Hours Grid	
33		11/20/2023	X	X	Statement of Deficiency 9/13/2019	
957a		11/20/2023	X	X	Brighton Servey 1/24/2020 Part 1	
955		11/20/2023	X	x	Nursing care grid with schedules attached	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
988		11/20/2023	X	X	Nursing Care hours for Mount Lebanon for 9/20-9/26 ; 9/27-10/3 and 10/4-10/10
1		11/20/2023	X	X	2567 Statement of Deficiency 10/10/2018
990a		11/20/2023	X	X	Cover Sheet to Communicate Internal Communications with Supervisor
991c		11/20/2023	X	X	Fax Coversheet from facility to Surveyor
991b		11/20/2023	X	X	Nursing Care Hours Total for each category
3		11/20/2023	X	X	2567 Statement 1of Deficiency for Mount Lebanon 10/4/2019
992a		11/20/2023	X	X	Internal Memorandum for Mount Lebanon Srurvey 11/13 and 11/14 2019 Offsite revisist
992b		11/20/0203	X	X	Surveyor Notes Worksheet for 11/13 and 11/14 2019
992c		11/20/2023	X	X	Guidance to help calculate Nursing Hours
992d		11/20/2023	X	X	Nursing hours for Mount Lebanon Facility 10/20-10/26; 10/27-11/2 11/3-11/9
986a		11/20/2023	X	X	Coversheet of Survey done at Mt. Lebanon 1/3/2020 - 1/14/2020
987		11/20/2023	X	X	Nursing Care Hours Grid Sheet with 11/17 - 11/23; 11/24-11/30; 12/22-12/28
993a		11/20/2023	X	X	Complaint Survey Completed at Mt. Lebanon 2/20/2020
994		11/20/2023	X	X	Staffing Schedules and Staffing Grid
	H1	11/16/2023	X		Defendant Hamilton Demonstrative Chart of Indictment
	H2	11/16/2023	X		Defendant Hamilton Demonstrative Picture of Brighton Nursing Home
	Ha1	11/21/2023	X		Defendant Halper Demonstrative Collective Bargaining Agreement
4379		11/21/2023	X		Brighton Timesheet
3275		11/21/2023	X		Written Note by Ms. Fowlkens
3753		11/21/2023	X	X	Redacted MDS Resident Screening
3758		11/21/2023	X	X	Audit Report for TM
3762		11/21/2023	X	X	Progress notes for TM by Susan Gerad
3761		11/21/2023	X	X	Progress notes for TM by Johnna Haller
3541		11/21/2023	X	X	MDS for patient CH
3546		11/21/2023	X	X	Audit Report of Pataient CH by Johnna Haller
3547		11/21/2023	X	X	Audit Report of Patient CH by Susan Gerad
3540		11/21/2023	X	X	Progress Note for CH by Johnna Haller

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
4213		11/21/2023	X	X	MDS for GZ
4218		11/21/2023	X	X	Audit Report for GZ
4220		11/21/2023	X	X	Progress notes for GZ by S Gerard
4219		11/21/2023	X	X	Progress notes for GZ for MDS correction by J. Haller
3475		11/21/2023	X	X	FF 6/6/2017 MDS Form
3480		11/21/2023	X	X	FF 6/6/2017 Audit Report by J. Haller
3477		11/21/2023	X	X	FF Progress Notes by S. Gerard
3476		11/21/2023	X	X	FF Progress Notes by J. Haller
3550		11/21/2023	X	X	DH 6/23/2017 MDS Form
3555		11/21/2023	X	X	DH 6/23/2017 Audit Report by J. Haller
3556		11/21/2023	X	X	DH Progress Notes by S. Gerard
3549		11/21/2023	X	X	DH Progress Notes by J. Haller
3794		11/21/2023	X	X	RM 6/15/2017 MDS Form
3800		11/21/2023	X	X	RM 6/15/2017 Audit Report by J. Haller
3801		11/21/2023	X	X	RM Progress Notes by S. Gerard
3799		11/21/2023	X	X	RM Progress Notes by J. Haller
3423		11/21/2023	X	X	WD 6/17/2017 MDS Form
3440		11/21/2023	X	X	WD 6/17/2017 Audit Report by J. Haller
3433		11/21/2023	X	X	WD Progress Notes by J. Haller
	F19	11/28/2023	X	X	List of Patient Diagnosis for CH
	F50	11/28/2023	X	X	CH Medical File
	F29	11/28/2023	X	X	Activities Assessment for WD
	F17	11/28/2023	X	X	Diagnosis Audit Report for WD
	F28	11/28/2023	X	X	Medical file for WD
	F22	11/28/2023	X	X	Diagnosis for Patient RM
	F21	11/28/2023	X	X	Diagnosis for Patient TM
	F20	11/28/2023	X	X	Diagnosis for Patient DH

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	F18	11/28/2023	X	X	Audit Report for FF
	F23	11/28/2023	X	X	Diagnosis for Patient GZ
	F3	11/28/2023	X	X	Ground Floor Map of Mount Lebanon facility
	F6	11/28/2023	X		Census list for CH
	F4	11/28/2023	X		Census list for WD
	F9	11/28/2023	X		Census List for RM
	F8	11/28/2023	X		Census List for TM
	F7	11/28/2023	X		Census List for DH
	F5	11/28/2023	X		Census List for FF
	F10	11/28/2023	X		Census List for GZ
	F56	11/28/2023	X	X	Email 5/15/2017 from J. Haller to J. Fowlkens
	F58	11/28/2023	X		Navi Health Scorecard
4213		11/28/2023	X		MDS Report for GZ
2224		11/28/2023	X	X	Email to Sam Halper from J. Reichard
2225		11/28/2023	X	X	Attachment to email to sam Halper from J. Reichard re Nursing Care Hours
3274		11/28/2023	X	X	Portion of Email from H. Pannell to S. Halper October 2014
2215		11/28/2023	X	X	S. Halper response email to H. Pannell
	F27	11/29/2023	X	X	Progress Note by Malia Black
	F86	11/29/2023	X	X	Activity Participation review for 6/23/2017
	F90	11/29/2023	X	X	Progress notes by S. Gerard dated 6/20/2017
	F89	11/29/2023	X	X	Progress Notes by S. Gerard for June 2017
	F26	11/29/2023	X	X	Progress Notes by J. Haller for June 30, 2017
	F54	11/29/2023	X	X	Medical File for Resident GZ
	G1	11/29/2023	X	X	Written Discipline for V. Miller
	3274A	11/29/2023	X	X	Excel spreadsheet
4433		11/30/2023	X	X	Text Message from Y. Naditich to S. Gilbert
4434		11/30/2023	X	X	Text Message from Y. Naditich to P. McCleary

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
4435		11/30/2023	X	X	Text Message from Y Naditich to P. McCleary and S. Gilbert
4436		11/30/2023	X	X	Text Message from Y. Naditich to S. Gilbert and P. McCleary
4437		11/30/2023	X	X	Text Message from Y. Naditich S. Gilbert and
4451		11/30/2023	X		Text Message from Y. Naditich
2353		11/30/2023	X	X	letter of resignation with redaction
	G4	11/30/2023	X	X	Email to Y.Naditich, S. Gilbert and V. Miller and E. Trobanian
	G3	11/30/2023	X	X	Email 10/11/2018 from M. Stillwagon to multiple recipients
	G7	11/30/2023	X	X	Email from J. Pardy to Multiple recipients
	G10	11/30/2023	X	X	Email from M. Stillwagon to multiple recipients 8/12/2019
	G12	11/30/2023	X	X	Email from N. Hardaway to multiple recipients 1/20/2020
	G13	11/30/2023	X	X	Email from N. Hardaway to multiple recipients
	G21	11/30/2023	X	X	Text Message from Y. Naditich to M. Stillwagon
	G14	11/30/2023	X	X	Mt. Lebanon extra bonus time sheets
	G11	11/30/2023	X	X	Email from D. Ferraro 2/28/2020
	G17	11/30/2023	X		Photo from 1/22/21
	G18	11/30/2023	X		Photo from 1/22/21
4721		11/30/2023	X	X	Stipulation as to Authenticity of Records
4609		11/30/2023	X	X	Excel Spreadsheet re: Cost Comparison
4618		11/30/2023	X	X	Nurising Totals Bar Graph Chart
4619		11/30/2023	X	X	Registered Nurse Line Graph Chart
4620		11/30/2023	X	X	Resident Care and Nursing Expenses Chart
4617		11/30/2023	X	X	Resident Care and Nursing Expenses Chart
4612		11/30/2023	X	X	Spreadsheet re: Claims Data
4610		11/30/2023	X	X	Reimbursement Summary Chart
4611		11/30/2023	X	X	Total Reimbursement Chart
4615		11/30/2023	X	X	Reimbursement Summary Chart
4616		11/30/2023	X	X	Total Reimbursement Chart

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
4613		11/30/2023	X	X	Reimbursement Summary Chart
4614		11/30/2023	X	X	Total Reimbursement Chart
	4225	11/30/2023	X	X	Report Calendar
	E36	11/30/2023	X	X	Email
	E37	11/30/2023	X	X	3/19/21 Email
3082A		11/30/2023	X	X	Bank Account Document
4708B		11/30/2023	X	X	Bank Account Records
4707B		11/30/2023	X	X	Line Item Info
4386		12/1/2023	X	X	Snapshot of Staff and PPD going back to 2014 with limitation
4300		12/1/2023	X	X	Staffing sheet
	D23	12/1/2023	X	X	Hamilton 23 - Staffing Sheet
	D4	12/1/2023	X	X	Hamilton 4 - ATC HealthCare Invoice Staffing Sheet Dated 7/19/2018
	D6	12/1/2023	X	X	Hamilton 6 - ATC Healthcare Staffing Invoice for J. Millie - Invoice Date 8/9/2018
	D8	12/1/2023	X	X	Hamilton 8 - Staffing Invoice - Invoice Date 8/3/2018
	D9	12/1/2023	X	X	Hamilton 9 Invoice for P. Rankin Invoice Date 8/9/2018
	D10	12/1/2023	X	X	Hamilton 10 - Liken Invoice- Invoice Date 10/26/2018
	D12	12/1/2023	X	X	Hamilton 12 - All American Invoice - Invoice Date 10/26/2018
	D13	12/1/2023	X	X	Hamilton 13 - Timesheet J. Wojciechowski 10/14/2018 to 10/18/2018
	D19	12/1/2023	X	X	Hamilton 19 - Care Unlimited Invoice for Shield 7/10/19
	D20	12/1/2023	X	X	Hamilton 20- Flagstar Invoice for C. Ward - Invoice Date 3/16/2019
	D21	12/1/2023	X	X	Hamilton 21- Flagstar Invoice - Invoice Date 3/16/2019 for C. Heusey
	D22	12/1/2023	X	X	Hamilton 22 - All American Invoice - Invoice Date 3/15/2019
	B3	12/1/2023	X	X	Halper 3 - 7/31/2013 Inspection Report
	B4	12/1/2023	X	X	Staffing Agency Email to S. Halper dated 4/16/2014
	B1	12/1/2023	X	X	Halper 1 Agreement - One Section Conditionally Admitted in Part
	B5	12/1/2023	X	X	Halper 5 - Raise Approval for S. Harrington
	B7	12/1/2023	X		TimeLine of events for S. Harrington

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	4231	12/4/2023	X	X	RDI Manual (Gov Exhibit List - Defense Admitted) October 2019
	E40	12/4/2023	X	X	Nuring ADL Clarification Note written by K. Gleason
	E43	12/4/2023	X	X	Nursing ADL Clarification Note written by K. Gleason
	E44	12/4/2023	X	X	Nursing ADL Clarification Note written by K. Gleason
	E41	12/4/2023	X	X	Email from M. Romeo to K. Gleason et al dated 6/4/2020
4241		12/4/2023	X	X	Resident Data Reporting Manual
4229		12/4/2023	X	X	Powerpoint exert explaining Medicaid MDS
4724		12/4/2023	X	X	Full Powerpoint Demonstrative Purposes
4225		12/4/2023	X	X	CMI Report Calendar
3419		12/4/2023	X	X	Resident TD September 2017-August 2018 Assessment
3415		12/4/2023	X	X	MDS Items - Audit Report March 2018 Assessment
3420		12/4/2023	X	X	Progress Note by J. Haller
4195		12/4/2023	X	X	Score Report for A.Z.
4194		12/4/2023	X	X	Assessment History Report for A.Z
4202		12/4/2023	X	X	Audit Report for A.Z.
4211		12/4/2023	X	X	InActivation Request for A.Z.
3864		12/4/2023	X	X	Score Report for A.P.
3865		12/4/2023	X	X	Assessment History Report for A.P.
3860		12/4/2023	X	X	Audit Report A.P.
3866		12/4/2023	X	X	Progress Notes by J. Haller for A.P.
3876		12/4/2023	X	X	Progress Notes by J. Haller for Cheswick
3795		12/4/2023	X	X	Outcome Summary Report RM
3802		12/4/2023	X	X	Assessment History Report RM
3558		12/4/2023	X	X	Assessment History Report DH
	F24	12/4/2023	X	X	CMI Rooster Report for August 2017 - for Mt. Lebanon
	F100	12/5/2023	X	X	Staffing Note
	F31	12/5/2023	X		CMI Report for May 2018 - Grove at New Castle

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	F96	12/5/2023	X	X	Demographic sheet from the medical record for A.Z.
	F97	12/5/2023	X	X	CMI for August 2019 for Grove at Latrobe
	F98	12/5/2023	X	X	CMI for Grove at New Castle
	F42	12/5/2023	X	X	CMI Report for Cheswick May 2018
	F101	12/5/2023	X	X	Contract for K. Weaver Services
	R1	12/5/2023	X		Romeo Demonstrative 1 - RUG Categories with Rehab - PA Medicaid CMI
	E46	12/5/2023	X	X	Email from M. Romeo to K. Weaver
	E47	12/5/2023	X	X	Email from M. Romeo to K. Weaver
	E48	12/5/2023	X	X	MDS for AP
	B7	12/5/2023	X		Agreement between Amerihealth and Brighton
	B8	12/5/2023	X		Agreement between Amerihealth and Mount Lebanon
4227		12/5/2023	X	X	CMI RUG Scores and Numeric Value
1049		12/5/2023	X	X	CMI and MDS Emails for Brighton
1051		12/5/2023	X	X	CMI and MDS Emails for Brighton
3524		12/5/2023	X	X	MDS Section G
3527		12/5/2023	X	X	Audit Report by C. Johnson for C.G.
3612		12/5/2023	X	X	MDS Assessment for S.K.
3621		12/5/2023	X	X	Audit Report by C. Johnson for S.K.
3620		12/5/2023	X	X	Audit Report for C. Green for S.K.
3626		12/5/2023	X	X	Note by C. Green for S.K.
4732		12/5/2023	X	X	Text Messages between RNAC at South Hills and M.Romeo and C. Johnson
4731		12/5/2023	X	X	Text Messages between J. Haller and C. Johnson
	E35	12/6/2023	X	X	Email from K. Weaver to B. Adams et al
	E97	12/6/2023	X	X	Email dated 8/12/2020 including C. Johnson
	E52- E96	12/6/2023	X	X	Case Mix Reports uploaded to the state.
	RD2	12/6/2023	X		Romeo Demonstrative 2
	E99	12/6/2023	X	X	Email from Michelle to MDS Nurses including C. Johnson

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	E119	12/6/2023	X	X	Email with Training information for CNA that was sent to C. Johnson et al
	E101	12/6/2023	X	X	Email from Mi. Romeo to C. Johnson
	E102	12/6/2023	X	X	Email from M. Romeo to C. Johnson April 2021
	E109	12/6/2023	X	X	Email forwarded from M. Romeo to C. Johnson
	E111	12/6/2023	X	X	Email from C. Johnson to M. Romeo re ADI Training
3815		12/6/2023	X	X	Gov Exhibit 3815 - Admitted by Defense - Note by C. Johnson
	F111	12/6/2023	X	X	C. Johnson Immunity Lettter
	F106- F110	12/6/2023	X	X	Audit Reports by B. Bolt
4068		12/6/2023	X	X	Gov Exhibit admitted by defense - Progress notes for B.R.
	E120	12/6/2023 3	X	X	Email April 2020
	E121	12/6/2023	X	X	Email String from M. Romeo
	E122	12/6/2023	X	X	Emails May 18th
4659A		12/6/2023	X	X	DHS Quarterly Rates Chart
4658		12/6/2023	X	X	DHS Claims payment for 15 facilities
4660A - 4675 A		12/6/2023	X	X	Chart summarizing CMI Data - Exhibits 460A through 4675A
340		12/7/2023	X	X	MLRWC Provider Agreement
333		12/7/2023	X	X	Brighton Enrollment application
342		12/7/2023	X	X	Monroeville CHOW PROMISE Provider Agreement
345		12/7/2023	X	X	Murrysville CHOW PROMISE Provider Agreement
346		12/7/2023	X	X	NSRWC CHOW PROMISE Provider Agreement
350		12/7/2023	X	X	SHRWC CHOW PROMISE Provider Agreement
353		12/7/2023	X	X	TGG CHOW PROMISE Provider Agreement
355		12/7/2023	X	X	TGH CHOW PROMISE Provider Agreement
360		12/7/2023	X	X	TGLCHOW PROMISE Provider Agreement
362		12/7/2023	X	X	TGNC CHOW PROMISE Provider Agreement
364		12/7/2023	X	X	TGNW CHOW PROMISE Provider Agreement
367		12/7/2023	X	X	TGW CHOW PROMISE Provider Agreement

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
356		12/7/2023	X	X	TGI Provider Summary
334		12/7/2023	X	X	Cheswick CHOW PROMISe Provider Agreement
376		12/7/2023	X	X	Brighton Medicare
448		12/7/2023	X	X	Mt. Lebanon Medicare
4650A		12/7/2023	X	X	7/17/2018 Survey
4719		12/7/2023	X	X	Brighton Combined Demonstratives
4652A		12/7/2023	X	X	Mt. Lebanon Summary of false entries
4720		12/7/2023	X	X	MLWRC Combined Demonstratives
4388A		12/7/2023	X	X	Time Card for S. Gilbert and Y. Naditch
4401A		12/7/2023	X	X	Extra Shift Bonus Sheet
4401B		12/7/2023	X	X	Daily Schedule for 10/13/18
1607		12/7/2023	X	X	Email with response from S. Halper
1610		12/7/2023	X	X	Email with response from S. Halper
1611		12/7/2023	X	X	Email from A. Chobanian with response from S. Haloer
1612		12/7/2023	X	X	Email from A. Chobanian with Census Sheet
1778		12/7/2023	X	X	Email 10/21/2018 from A. Chobanian with Census Sheet
1613		12/7/2023	X	X	Email from A. Chobanian
1615		12/7/2023	X	X	Email from A. Chobanian
2532		12/7/2023	X	X	Other facility staffing
2331		12/7/2023	X	X	Letters from Dept of Health to S. Gilbert
2369		12/7/2023	X	X	Email from S. Gilbert to Team O2
2370		12/7/2023	X	X	Email from S. Gilbert to Team O2
2422		12/7/2023	X	X	Email from S. Gilbert to A. Nelis with attachments
2423		12/7/2023	X	X	Staffing Sheets Associated with Jan 2020
3274		12/7/2023	X	X	Email from M. Lahasky 10/3/14 - Inflated PPD Email
2262		12/7/2023	X	X	Email 2/17/2017 to M. Jordan
1900		12/7/2023	X	X	Email 3/1/2017 from M. Jordan

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
1834		12/7/2023	X	X	Email 5/2/17 re Beholds
1253		12/7/2023	X	X	Email exchange
2144		12/7/2023	X	X	Email re Brighton Staffing
2130		12/7/2023	X	X	Email from J. Reicher to S. Halper re staffing
2046		12/7/2023	X	X	Email from J. Reicher to T. Lowden and T. Lowden to E. Hamilton re ppd
1870		12/7/2023	X	X	Email from T. Lowden to E. Hamilton - DOH Tag
2276		12/7/2023	X	X	Email Chain - E Hamilton most recent email
2038		12/7/2023	X	X	7/19/2018 Email Chain
2106		12/7/2023	X	X	9/4/2018 Email Chain
2082		12/7/2023	X	X	1/29/2019 Email Chain
2073		12/7/2023	X	X	9/20/2019 Email Chain
1355		12/7/2023	X	X	11/3/2019 Email Chain
1359		12/7/2023	X	X	11/4/2019 Email Chain
2025		12/7/2023	X	X	1/10/2020 Email Chain
1239		12/7/2023	X	X	9/30/2014 Email Chain
1153		12/7/2023	X	X	8/10/2015 Email Chain
1161		12/7/2023	X	X	9/24/2015 Email Chain
1121		12/7/2023	X	X	12/14/2015 Email Chain
1133		12/7/2023	X	X	2/10/2016 Email Chain
1137		12/7/2023	X	X	2/16/2016 Email Chain
1089		12/7/2023	X	X	5/21/2016 Email Chain
1289		12/7/2023	X	X	10/10/2016 Email Chain
1298		12/7/2023	X	X	10/24/2016 Email Chain
1301		12/7/2023	X	X	10/25/2016 Email Chain
1312		12/7/2023	X	X	11/10/2016 Email Chain
1096		12/7/2023	X	X	3/9/2016 Email Chain
1086		12/7/2023	X	X	8/9/2016 Email Chain

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
1512		12/7/2023	X	X	9/19/2017 Email Chain
3012		12/7/2023	X	X	Email to Savoy Bank
1316		12/7/2023	X	X	Email chain from S. Halper to M. Lechtner/Romeo
1844		12/7/2023	X	X	1/8/2018 Email Chain
1846		12/7/2023	X	X	1/17/2018 Email Chain
1247		12/7/2023	X	X	2/13/2018 Email Chain
1384		12/7/2023	X	X	4/5/2018 Email Chain
1073		12/7/2023	X	X	5/22/2018 Email Chain
1382		12/7/2023	X	X	6/13/2018 Email Chain
1385		12/7/2023	X	X	4/5/2018 Email Chain
2321		12/7/2023	X	X	8/20/2018 Email Chain
1401		12/7/2023	X	X	8/4/2016 Email Chain
1288		12/7/2023	X	X	10/3/2016 Email Chain
1145		12/7/2023	X	X	7/31/2015 Email Chain
1391		12/7/2023	X	X	9/12/2016 Email Chain
1378		12/8/2023	X	X	10/30/2018 Email Chain
1271		12/8/2023	X	X	7/28/2017 Email Chain
2281		12/8/2023	X	X	11/2/2019 Email Chain
4712		12/8/2023	X	X	1/15/2013 RedactedEmail Chain
1109		12/8/2023	X	X	4/18/2016 Email Chain
4713		12/8/2023	X	X	5/9/2018 Email Chain
3004A		12/8/2023	X	X	Expense Report for Western PA Consultants for J. Haller
3385		12/8/2023	X	X	MDS for H.D.
3396		12/8/2023	X	X	Progress Note 7/23/2019 documenting PHQ 9
3403		12/8/2023	X	X	Audit Report for D 200 and 300
3732		12/8/2023	X	X	Audit Report for M.M.
3737		12/8/2023	X	X	MDS for M.M

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
4021		12/8/2023	X	X	Audit Report for J.S.
4022		12/8/2023	X	X	MDS for J.S.
4027		12/8/2023	X	X	Progress notes by J. Haller
	B9	12/8/2023	X	X	3/7/2016 Email Chain
	B10	12/8/2023	X	X	10/3/2016 Email Chain
	B11	12/8/2023	X	X	9/20/2019 Email Chain
	B12	12/8/2023	X	X	9/4/2018 Email Chain
	JH1	12/8/2023	X		Haller Demonstrative 1 - Google Map
	F115	12/8/2023	X	X	Thieabold Progress Note
	F119	12/8/2023	X	X	Audit Report for M.M. with an ARD 11/14/2019
	JH3	12/8/2023	X		Haller Demonstrative 3 - MM MDS Assessment
	F114	12/8/2023	X	X	Progress Note updated by J. Haller
	F116	12/8/2023	X	X	Admission Record 6/15/2018
4028		12/8/2023	X	X	Progress Notes for JS entered by S. Gerard - Government Exhibit Admitted by Defense
	F105	12/8/2023	X	X	Diagnosis Sheet for J.S.
	JH2	12/8/2023	X		Haller Demonstrative 2 - Google Map
3394		12/8/2023	X	X	Scoring Report for H.D. - Government Exhibit Admitted by Defense
	F45	12/8/2023	X	X	Screen Capture from Point Click Care for H.D.
	F2	12/8/2023	X	X	7/10/2017 Email Chain re expense report
	F33	12/8/2023	X	X	Email Thread re Expense Report
	F121	12/8/2023	X	X	2/21/2019 Email Thread
	E26	12/8/2023	X	X	Image from Michelles phone
1139		12/8/2023	X	X	Government Exhibit Admitted by Defense - 7/30/2015 Email Chain
	G23	12/8/2023	X	X	Letters to S. Gilbert
	G33	12/8/2023	X	X	Fax 10/15/18
	G44	12/8/2023	X	X	Fax
	G34	12/8/2023	X	X	Nursing Care Hours Sheet

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	G24	12/8/2023	X	X	Time Card 1/12/20 - 1/18/20
	G25	12/8/2023	X	X	*G25A - Daily Schedule Sheet Mt. Lebanon 2/8/2020
	G26	12/8/2023	X	X	*G26A - Daily Schedule Sheet Mt. Lebanon 2/9/2020
	G27	12/8/2023	X	X	*G27C - Extra Shift Bonus Form
	G28	12/8/2023	X	X	*G28A - Daily Scheulde Sheet
	G28	12/8/2023	X	X	*G28B Time Card
	G30	12/8/2023	X	X	*G30A Daily Schedule Sheet for T. Benson
	G30	12/8/2023	X	X	*G30B - Time Card for T. Benson
	G31	12/8/2023	X	X	*G31A Bonus Form
	G31	12/8/2023	X	X	*G31B J. Partee Bonus Form
	G32	12/8/2023	X	X	Bonus Form for T. Davies
	C1A	12/8/2023	X		Spreadsheet Punch Card Data
	C1B	12/8/2023	X		Spreadsheet Punch Card Data
	C2A	12/8/2023	X		Spreadsheet Punch Card Data
	D3	12/11/2023	X	X	Time Card for Brighton
	D5	12/11/2023	X	X	Time Card for Brighton
	D10	12/11/2023	X	X	*D 10A - Time Card Brighton
	D6A	12/11/2023	X	X	Time Card for Brighton
	D6	12/11/2023	X		
	D8	12/11/2023	X		
1397		12/11/2023	X	X	Email Chain 7/11/2016
1422		12/11/2023	X	X	Email Chain 8/26/2016
1519		12/11/2023	X	X	Email Chain 12/8/2016
4737		12/11/2023	X	X	Email
	F40	12/11/2023	X	X	J Haller Expense Reports
3434		12/11/2023	X	X	Assessment History Report for RM
	F1	12/11/2023	X	X	Email Chain with J. Haller and A. Mcateer

AO 187A (Rev. 7/87)

EXHIBIT AND WITNESS LIST – CONTINUATION

UNITED STATES OF AMERICA vs. SUSAN GILBERT et. al.					CASE NO. 2:21-cr-79
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	F11	12/11/2023	X	X	Audit Report
	F12	12/11/2023	X	X	Audit Report
	F13	12/11/2023	X	X	Audit Report
	F14	12/11/2023	X	X	Audit Report
	F15	12/11/2023	X	X	Audit Report
	F16	12/11/2023	X	X	Audit Report for S. I.
	JH2	12/11/2023	X		Haller Demonstrative June 30 2017 Interviews
	E38	12/11/2023	X	X	Email Chain
	E50	12/11/2023	X	X	Brighton Visit Summary Report
	E51	12/11/2023	X	X	Personel file for A. McAteer - on a limited basis
4772		12/12/2023	X	X	Additional Stipulations re Authentication
3759		12/12/2023	x	x	MDS for TM - cross check for 3753
	E126	12/12/2023	X	X	K. Lightner review at Brighton
	E127	12/12/2023	X	X	Review or Report
1158		12/12/2023	X	X	Admitted by Defense - Email from S. Halper 9/1/2015
	E129	12/12/2023	X	X	Email dated 1/27/2020 from M.Romeo
	E128	12/12/2023	X	X	Visit Summart Report for the Grove a New Wilmington
	E131	12/12/2023	X	X	Audit Report for LG
	E130	12/12/2023	X	X	Audit Report for JM
	E132	12/12/2023	X	X	Assessment for SR
4785		12/12/2023	X	X	Email
	C1A	12/12/2023	X	X	Punchcard Data
	C2A	12/12/2023	X	X	Punchcard Data
	B14	12/12/2023	X	X	Summary of PPD Estimates
4771		12/12/2023	X		K. Lightner Report
4778		12/12/2023	X	X	Daily Adjustment Sheet
4782		12/12/2023	X	X	Punchcard data spreadsheet exerpt

[illegible]